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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HOLLYWOOD CITIZEN NEWS
OPERATING COMPANY, LLC, and
HOLLYWOOD CITIZEN NEWS F&B,
LLC,

Plaintiffs,

vs.

TEN FIVE HOSPITALITY LLC, and DAN
DALEY,

Defendants.

Case No. 2:23-cv-01126-APG-DJA

**STIPULATION TO EXTEND TIME
TO RESPOND TO PLAINTIFFS'
COMPLAINT (ECF NO. 1) AND
MOTION FOR PRELIMINARY
INJUNCTION AND TO COMMENCE
DISCOVERY (ECF NOS. 3 AND 4)**

(FIRST REQUEST)

1 Plaintiffs Hollywood Citizen News Operating Company, LLC and Hollywood Citizen
2 News F&B, LLC (collectively, “Plaintiffs”) and Defendants Ten Five Hospitality LLC and
3 Dan Daley (collectively, “Defendants” and, together with Plaintiffs, the “Parties”), by and through
4 their undersigned counsel, for good cause shown, hereby stipulate and agree that Defendants’
5 counsel will accept service on behalf of Dan Daley, without prejudice to Mr. Daley’s defenses or
6 objections except under FRCP 12(b)(5), and to extend Defendants’ deadline to file their response
7 to Plaintiffs’ Motion for Preliminary Injunction and Leave to Immediately Commence Discovery
8 [ECF Nos. 3 and 4] (the “Motion”) from August 7, 2023, to August 18, 2023, to extend
9 Defendants’ deadline to answer, move, or otherwise respond to the Complaint [ECF No. 1] from
10 August 14, 2023, to August 18, 2023, and to extend Plaintiff’s reply deadline relative to the
11 Motion to September 1, 2023, for the following reasons:

12 1. Plaintiffs served the Complaint and the Motion on July 24, 2023.
13 2. Defendants’ response to the Motion is currently due on August 7, 2023.
14 3. Defendants’ response to the Complaint is currently due on August 14, 2023.
15 4. Defendants’ counsel has conflicting professional commitments and previously
16 scheduled travel planned between July 24 and August 14, 2023, and the Complaint and Motion
17 present complex and interrelated legal and factual issues warranting an extension of time for
18 Defendants’ responses.

19 5. Defendants are reviewing Plaintiffs’ request for leave to immediately serve
20 discovery (*see* ECF Nos. 3 and 4, at § IV), to determine whether this issue can be resolved by
21 stipulation before Defendants’ response date, and the Parties agree to meet and confer regarding
22 the same.

23 6. This extension is sought in good faith and is not made for the purpose of delay.

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THEREFORE, the Parties respectfully request an extension for Defendants to file their response to the Motion from August 7, 2023 to and including August 18, 2023, to file a response to the Complaint from August 14, 2023, to August 18, 2023, and of Plaintiffs' reply deadline relative to the Motion to September 1, 2023.

THE PARTIES SO STIPULATE

Dated: July 31, 2023

Dated: July 31, 2023

GARMAN TURNER GORDON LLP

SNELL & WILMER L.L.P.

By: /s/ Dylan Ciciliano

By: /s/ V.R. Bohman

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Attorneys for Defendants

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ORDER

IT IS SO ORDERED.

DATED: this 3rd day of August 2023.



DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

4883-4136-8179

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